

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM §
RICHARD KING, LAVAR SANTEE, §
FRED WALLACE, MARVIN RAY §
YATES, individually and on behalf §
of those similarly situated, §
Plaintiffs, §

v. §

Civil Cause No. 4:14-cv-1698

BRYAN COLLIER, in his official §
capacity, ROBERTO HERRERA, in his §
official capacity, and TEXAS §
DEPARTMENT OF CRIMINAL §
JUSTICE, Defendants. §

AFFIDAVIT OF LORIE DAVIS

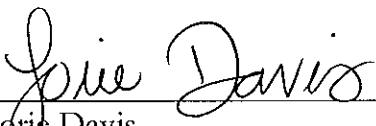
My name is Lorie Davis. I am over eighteen years of age, of sound mind, capable of making this affidavit, and I have personal knowledge of the facts herein stated. I am currently employed as the Correctional Institutions Division (CID) Director for the Texas Department of Criminal Justice ("TDCJ").

On August 9, 2019, thirty-seven (37) inmates who are members of the *Cole v. Collier* class, were transported from the LeBlanc Unit in an air-conditioned transport bus. Thirty-six (36) of the class members were transported to the Pack Unit and arrived around 11:00 p.m. The remaining class member was transported to the Stiles Unit, due to a conflict that precludes his assignment to the Pack Unit, where he has been housed in an air-conditioned housing area. The inmates' property was transported with them, either on the bus with the inmates, or in a chase van that followed behind the bus.

No member of the Class shall suffer any loss of status or any postponement of an applicable release date because of his transfer from the LeBlanc Unit.

I declare under penalty of perjury that the foregoing is true and correct.

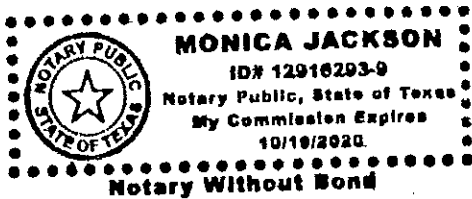
Executed on August 12, 2019.



Lorie Davis
Director, Correctional Institutions Division
Texas Department of Criminal Justice

Before me, **LORIE DAVIS** personally appeared, who is personally known to me to be the person whose name is subscribed to the foregoing instrument and acknowledge to me that she executed the same.

Given under my hand and seal of office on this 12th day of August, 2019.



Monica Jackson

Notary Public's Signature